

JOHNSON & PHAM, LLP
Christopher Q. Pham, SBN: 206697
E-mail: cpham@johnsonpham.com
Nicole Drey Huerter, SBN: 250235
E-mail: ndrey@johnsonpham.com
Hung Q. Pham, SBN: 276613
E-mail: ppham@johnsonpham.com
6355 Topanga Canyon Boulevard, Suite 326
Woodland Hills, California 91367
Telephone: (818) 888-7540
Facsimile: (818) 888-7544

Attorneys for Plaintiffs
BMW OF NORTH AMERICA, LLC
BAYERISCHE MOTOREN WERKE AG

QUINTANA LAW GROUP, APC
Andres F. Quintana, SBN: 190525
E-mail: andres@qlglaw.com
26135 Mureau Road, Suite 203
Calabasas, California 91302
Telephone: (818) 914-2104
Facsimile: (818) 914-2101

Attorney for Defendants
TRANSATLANTIC-TRADE.COM, LLC
GUNTER KREBS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

BMW OF NORTH AMERICA, LLC, a
Delaware Limited Liability Company,
and BAYERISCHE MOTOREN
WERKE AG, a German Corporation,

Plaintiffs,

v.

TRANSATLANTIC-TRADE.COM,
LLC, a Florida Limited Liability
Company; GUNTER KREBS, an
Individual; and DOES 1-10, Inclusive,

Defendants.

Case No.: 2:17-cv-00850-ODW-MRW

**NOTICE OF SETTLEMENT AND
JOINT RESPONSE TO ORDER TO
SHOW CAUSE**

Plaintiffs BMW OF NORTH AMERICA, LLC, and BAYERISCHE
MOTOREN WERKE AG (collectively "Plaintiffs") and Defendants

1 TRANSATLANTIC-TRADE.COM, LLC, and GUNTER KREBS (collectively
2 “Defendants”), by and through their counsel of record, respectfully write to notify
3 the Court that a tentative settlement has been reached between Plaintiffs and
4 Defendants.

5 The Parties respectfully request that the Order to Show Cause issued on
6 April 5, 2017 (Document 15) be discharged along with Defendants’ obligation to
7 file an Answer to the Complaint.

8 The Parties additionally respectfully request up to and including Friday, May
9 5, 2017, to prepare, finalize, and execute full form settlement documentation
10 memorializing the agreed terms of settlement and to file a stipulation for entry of
11 permanent injunction and dismissal with [proposed] permanent injunction and
12 dismissal to terminate the pending litigation.

13
14 DATED: April 7, 2017

JOHNSON & PHAM, LLP

15
16 By: /s/ Nicole Drey Huerter
17 Nicole Drey Huerter, Esq.
18 Attorneys for Plaintiffs
19 BMW OF NORTH AMERICA, LLC
BAYERISCHE MOTOREN WERKE AG

20 DATED: April 7, 2017

QUINTANA LAW GROUP

21
22 By: /s/ Andres F. Quintana
23 Andres F. Quintana, Esq.
24 Attorney for Defendants
25 TRANSATLANTIC-TRADE.COM, LLC
GUNTER KREBS